

Submission

Submitter:	Mr Andrew Curtin
Organisation Name:	HSE
Submission Title:	HSE Submission
Submission Reference No.:	S011788
Submission Received:	03 December 2024

Application

Applicant:	Deal View Farm Limited
Reg. No.:	P1217-01

See below for Submission details.

Attachments are displayed on the following page(s).



National Environmental Health Service
2nd Floor, Ashbourne Hall,
Ashbourne Business Park
Dock Road
Limerick
V94 NPEO

EPA Environmental Licensing Programme Office
Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
10th June 2024
Co. Wexford

Date: 2nd December 2024

Re: Industrial Emissions License Application

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above license application. If you have any queries regarding this report the contact is Andrew Curtin, Principal Environmental Health Officer at andrew.curtin@hse.ie

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Curtin', on a light-colored background.

Andrew Curtin
Principal Environmental Health Officer



**HSE Submission Report
National Environmental Health Service Consultation Report
(as a Statutory Consultee (Planning and Development Acts 2000) and
Regulations made thereunder)**

Date: 2nd December 2024

Application for: Industrial Emissions License Application

Report To:

Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Johnstown Castle Estate
Co. Wexford

Class and Nature of Activity: Activity Class 6.1(a), "The rearing of poultry in an installation, where the capacity exceeds 40,000 places.

Applicant: Deal View Farm Limited, Coolanoran, Newcastlewest, Limerick,

Location of Facility: Coolanoran, Newcastlewest, Limerick, Limerick, A00 AA00

EPA Ref. No: P1217-01

EHIS Ref: 4330

The following HSE Departments were notified of the consultation request for the Planning on 5th November 2024:

- Emergency Planning
- National Capital Estates Offices
- Director of National Health Protection
- REO Mid-West
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All commitments to future actions including mitigation and further testing have been taken as read, and all data has been accepted as accurate. No additional investigations/measurements were undertaken in the review of this application.

The report is based on an assessment of documentation viewed on EPA's Licencing website. This report refers only to those sections of the documents, which are relevant to the HSE.

Introduction

The National Environmental Health Service has not received any complaints in respect of the applicants existing poultry facility. However, it is important to clarify such complaints would be investigated by the Environmental Protection Agency.

In respect of this planning application, the areas reviewed were those of concern to National Environmental Health Department which are:

- Air including odour and noise
- Surface and groundwater
- Waste water, poultry litter and waste management

As this activity falls within the category 6.1(a) of Schedule 1 of the EPA Act 1992 (as amended) an Industrial Emissions Licence is required. This report only comments on Environmental Health Impacts of the Licence application.

The material submitted in this licence application was reviewed with reference to 'BAT Reference Document for the Intensive Rearing of Poultry and Pigs' (2017).

Application:

The site in question is located in a rural area within the townland of Coolanoran, Newcastlewest, Limerick. The proposed development consists of the construction of two poultry houses, two soiled water tank and associated works at the rear of the existing poultry operation at Coolanoran, Newcastle West, Co. Limerick.

Land-use surrounding the site is predominantly agricultural and the main habitat is improved agricultural grassland.

An application is being made by Deal View Farm Ltd., Coolanoran, Newcastlewest, Co. Limerick to the Environmental Protection Agency (E.P.A.) for a Licence in respect of their poultry farm at Coolanoran, Newcastlewest, Co. Limerick.

The application is to increase the capacity of birds residing on the the site. Planning permission was obtained from Limerick Co. Co. for the construction of 2 additional poultry houses (currently constructed permitting an overall capacity on the farm of 80,000 places).

This enterprise is classed as Activity Class 6.1(a), "The rearing of poultry in an installation, where the capacity exceeds 40,000 places.

There are approximately 10-15 dwellings within a 400-metre radius of the application site. There is also another poultry house operation 150metres to North West of the application site.

The main activities carried out on-site as per supporting documented submitted are:

- Transport of day old chicks to the farm
- Feeding and rearing of birds.
- General animal husbandry practices.
 - Transport of feed to the farm
- Transport of birds from site to factory at c. 35 – 52 days of age.
- Removal of litter from the houses.

- Transport of Litter off site.
- Washing of houses between each batch, for flock health and performance reasons.
- Bedding of houses with straw/shavings in preparation for the next crop.
- Maintenance of buildings and equipment.
- Recording and monitoring of internal house environment and bird performance and mortality.

Normal working hours on this site are primarily from 06.00hrs to 20.00hrs. However automated feeding and ventilation systems will operate continuously. Stock inspections in line with normal farming practices are and will be carried out every day including weekends and holidays. Automatic feeding and ventilation systems operate on a 24-hour basis and in addition, essential activities may be carried out outside of core working hours.

Planning/Site History:

The existing poultry farm operated by the applicants is located in a rural area in Co. Limerick. The subject site is an existing development site comprising of poultry housing and existing farming activities. There are no proposed developments in this application. The operation of the proposed activity will be integrated with the operation of the existing farming activities.

The capacity of the site is proposed to be increased 80,000 exceeding the threshold required for the preparation of an Environmental Impact Assessment Report as per S.I. 600 of 2001 (Planning and Development Regulations 2001), Schedule 5 Part 2 1 (e) (i) as follows: "Installations for intensive rearing of poultry not included in Part 1 of the Schedule which would have more than 40'000 places for poultry".

Odour & Noise

The National Environmental Health Service (NEHS) has reviewed the EIS Planning 12-24EIS11 notes that the summary concluded, "There are no residential location where the EPA guidelines are exceeded and thereby unlikely to cause noise nuisance to a reasonable person". It is the NHS observation that the results for each measurement location Table 1(a), 1 (b) and 1 (c) has been omitted from the report.

Noise levels at the existing poultry facility have not warranted complaints to date and noise sources at the operation are primarily internal with no expected changes to the external ambient noise environment.

The National Environmental Health Service recommends that a **programme for the inspection** and maintenance (as required) of ventilation fans to minimise any potential impact of noise from the ventilation fans on sensitive receptors.

NEHS has noted within the document entitled, License Application Form Non-Technical Summary October 2024 the following mitigation measures have been implemented:

1. Deliveries (inward & outward) are confined to the normal daily work routine.
2. Noise and odour emissions are to be reduced by the use of automated feeding and ventilation systems.
3. Houses to be stocked at optimum stocking levels, i.e. not overstocked.

The NEHS would recommend such measures as outlined are included as **condition** of a licence should be approved.

The NEHS has reviewed the Odour Management Plan 12-24EIS8. There are a number of management practices that will be implemented on site so as to minimise potential odour emissions from the site.

Management of operations on the site are imperative to prevent significant pulse releases of odour at times when the effect might be perceptible beyond the site boundary and should ensure minimal impact on air in the vicinity of the site.

The National Environmental Health Service notes that there is no proposed monitoring for dust or odour at the poultry operation due to the proximity of sensitive receptors within the vicinity of the proposed development.

The National Environmental Health Service would recommend if planning is approved a **condition** should be included that “that if any complaints are received, a follow up investigation will be initiated. This will be initiated as soon as feasible and all results made available to the local authority and any relevant bodies for inspection. In the event that dust or odour from the proposed development is creating an environmental nuisance an ambient dust deposition survey will be carried out by an air quality specialist and mitigation measures will be developed to eliminate the nuisance.”

The National Environmental Health service notes further mitigation measures outlined in the, License Application Form Non-Technical Summary October 2024. It is recommended that these measures are included as **conditions** if licensing is granted. This is in order to minimise the impact of odour from the facility on the nearest sensitive receptors and is a public health protection measure.

Surface and Groundwater

The National Environmental Health Service (NEHS) has considered any potential risk of contamination of surface and groundwater and makes the following comments:

The NEHS notes that there is no EIS in relation to surface and Groundwater.

NEHS recommends that all potentially polluting products (fuels, detergents etc.) to be stored in appropriately bunded/secured areas.

The only soiled water from the proposed development will arise due to washing down of poultry houses and adequate storage facilities are in place for this. The volume of water needed for the farm once the proposed activity commences should be proportionate to the proposed stock levels.

As the proposed activity will operate on a dry manure basis, the manure will be removed from the houses at the end of each cycle and removed off site by a licenced contractor and all soiled water will be collected onsite to ensure that there is minimal risk to groundwater supplies in the area of the site.

The Environmental Health Service recommends that details are provided of the ‘compost yards/recipient farmers’ receiving the manure and of the address of the land banks to be used for the spreading of manure.

Wastewater, poultry litter and waste management

It is vital that there is no deterioration in water quality in the watercourses in the vicinity during operation. The proposed activity should be carried out on an impermeable concrete base, with proper storm and soiled water separation and collection facilities.

The NEHS would recommend that monitoring of storm water be undertaken by means of weekly visual and 'sniff' testing.

The washings from when houses are being cleaned down are diverted to wash water holding tanks from where the washings or soiled waters are vacuum tankered to available lands for land spreading. Compliance with Section 4.6 'Spreading Poultry Manure' of the EPA's 'Batneec Guidance Note for the Poultry Production Sector' should be included as a condition of planning.

It is recommended that monitors are installed on the proposed washwater tank to reduce the risk of accidental overflow. This is **recommended for the protection of** nearby watercourses and in the interest of the protection of public health.

The National Environmental Health Service recommends that the **wastewater** storage tank is **inspected** annually to check for structural integrity.

The primary source of non-hazardous waste produced at the proposed facility is poultry litter, fallen birds and a small quantity of domestic waste. The National Environmental Health Service **recommends** that the licensed contractor responsible for the removal of poultry carcasses or reference to facilities for the onsite storage of poultry casualties and all records are maintained regarding disposal. It is **recommended** that containers for the storage of broiler casualties have sufficient capacity and that the containers are of steel construction and are water, pest and topple proof.

The EHS recommends that the applicant shall be requested to conform with the legal provision of article 23 (4) of S.L 31 of 2014 in respect of "an occupier of a holding shall provide such information as is requested relating to the movement of organic fertilisers on or off the holding". It should be a requirement of any licence issued that all such information is provided to the EPA well in advance of any slurry transportation so that potential land banks can be risk assessed and evaluated for suitability."

It is recommended that poultry litter is not removed during periods of heavy rain. This is to reduce the potential contamination of storm water (and ultimately surface and groundwater) and is in the interest of the protection of public health.

Due to the increase in the number of birds, it is **recommended that the applicant monitors ground nutrients on his lands by way of a Nutrient Management Plan which should be updated annually.**

Pest/Vector Control

Reference could not be found in the submitted documents to the issue of Pest/Vector Control. On a day to day basis the facility should operate a vector control plan to limit/eliminate the potential proliferation of disease vectors such as rodents, flies, and other potential vectors. The NEHS recommends an Integrated Vector Management approach to pest/vector control, through actions such as good design and construction of infrastructure such as drains, good waste management practices, such as the management of animal tissues and carcasses plus the application of measures to control vectors in all stages of their life cycle.

Conclusion

In respect of this planning application, the National Environmental Health Service recommends that-

- The waste water storage tank is inspected annually to check for structural **integrity**.
- Containers for the storage of broiler casualties **have** sufficient **capacity and** that the containers are of steel construction and are water, pest and topple proof.
- High level monitors are installed on the **proposed** washwater tank to reduce the risk of accidental overflow.
- It is recommended that a formal complaints procedure should be outlined to resolve any possible issues or community concern in relation to traffic, dust, water, noise, odour or nuisance complaints.
- Impervious concrete is provided throughout the site where necessary to enable the full collection of surface water to the surface water collection network.
- No contaminated material is stored on a site in a fashion that may undermine the environmental security of the collection system.
- All drains, guttering and other collection apparatus must be inspected at regular intervals.
- An inspection and maintenance programs for tanks and pipelines should be initiated to mitigate against the risk of leakage.
- High level over-flow collection where applicable – in particular a vacuum tanker should be on site as back-up during the washing process
- Valves should be placed at water diversion points to give added protection while unloading soiled water tanks.
- It is vital that there is no deterioration in water quality in the watercourses in the vicinity during operation hence all activities on site to be carried out be in accordance with the Department of Agriculture, Food and Marine, Bord Bia, EPA, and Limerick City & County Council specifications and/or industry standards.
- All organic fertiliser generated on the site to be removed by a registered contractor for use elsewhere.
- All soiled water to be appropriately collected, stored and utilised in accordance with the requirements of S.I. 605 of 2017 (as amended).
- All potentially polluting products (fuels, detergents etc.) to be stored in appropriately bunded/secured areas.
- Stormwater discharge points to be checked and inspected regularly for any sign of contamination
- Providing the development is kept as per the specifications detailed and operated and maintained as per Department of Agriculture, Food and Marine Guidance, the NEHS is of the opinion that there is adequate protection of Public and Environmental Health in the license conditions.
- An Integrated Vector Management approach to pest/vector control, through actions such as good design and construction of infrastructure such as drains, good waste management practices, such as the management of animal tissues and carcasses plus the application of measures to control vectors in all stages of their life cycle.

Arlene Ward

Arlene Ward
Environmental Health Officer
Environment/Climate Change, Network Support Unit (NSU)

*** All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to: Andrew Curtin**

